

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN
DISTRICT OF TENNESSEE

KIM KING and
DARREN KING
PLAINTIFFS

V.

NO: 2:22-CV-2030-JPM-atc

WILLIAM CHASE JR
DEFENDANT

PLAINTIFFS MOTION FOR PARTIAL SUMMARY JUDGMENT

Comes Now the Plaintiffs by and through undersigned counsel and pursuant to Rule 56 of the Federal Rules of Civil Procedure and LR 56 and would show this Honorable Court the following: Plaintiffs incorporate the Statement of Undisputed Material Facts and Memorandum filed contemporaneously herewith.

WHEREFORE, PREMISES CONSIDERED, the Plaintiffs respectfully urges the Court to grant Plaintiffs' Partial Motion for Partial Summary Judgment on Liability.

Respectfully Submitted,

/s/DRAYTON D. BERKLEY
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CERTIFICATE OF SERVICE

The undersigned hereby certifies a copy of the foregoing has been served upon counsel for the defendants in the U.S. Mail, first class postage paid, or e-mail and properly addressed or hand-delivery to:

Chris Frulla
Rainey Kizer
50 North Front Street
Memphis, TN 38103

This the 21st day of March 2022.

/s/DRAYTON D. BERKLEY
DRAYTON D. BERKLEY